

APPENDIX C

Guidelines For Evaluation Elements

	Evaluation Elements	Guidance
1.	Does management have a Food Defense Plan that is implemented, and reassessed by management to assure it remains relevant to the operation?	<ul style="list-style-type: none"> Procedures documented defining a food defense program. Food defense plan does <u>not</u> need to be formal (i.e., elements of a food defense plan may exist and be written in other company documentation; e.g., a recall plan). There is evidence that the Food Defense Plan is being followed. Plan identifies management responsibilities and frequency of review. Food Defense Plan is reassessed at least annually to assure it remains relevant to the operation.
2.	Does the Food Defense Plan address preventive measures relative to product tampering and deliberate contamination at the facility and during transport in commerce?	<ul style="list-style-type: none"> Includes description of policy and preventive measures to reduce the risk of product tampering. Measures separately address food defense issues for product whether at the facility or in transport (both incoming and outgoing).
3.	Do written defense practices list management contacts and procedures for notifying appropriate authorities in the case of an emergency or security issue?	<ul style="list-style-type: none"> Plan identifies management names and telephone numbers. Contacts for local authorities (police, fire, and rescue) are provided. Procedures describe steps involved in the notification process. These procedures may be verified in a documented recall program – if one exists.
4.	Do company personnel hiring practices include screening all potential employees?	<ul style="list-style-type: none"> Review personnel files to verify security screening. Acceptable screening includes <u>one</u> of the following: <ol style="list-style-type: none"> Employee references obtained and verified? Employee immigration status checked (INS Form I-9). Criminal background checks for employees, as needed (FBI Investigation watch list).
5.	After hiring, are photo identification or other measures employed to restrict access to the facility?	<ul style="list-style-type: none"> Verify identification practices through observations. Verify measures used to restrict access.
6.	Have employees received training in Food Defense, and is the Food Defense training documented?	<ul style="list-style-type: none"> Verify food defense training records for employees.
7.	Do supplier delivery personnel, contract workers, and visitors have restricted access to vulnerable product areas of the facility and are they accompanied by a company representative?	<ul style="list-style-type: none"> Security policy defines restricted access areas. Verify policy practices and procedures through observation.
8.	Are the outside premises of the facility secure with limited access to vulnerable areas?	<p>The following guidance is for questions 8-10:</p> <ul style="list-style-type: none"> Restricted access points to grounds and facility are defined and identified. Security monitored manually or mechanically as demonstrated by documentation. Verify the presence of posted signs or other measures used to secure and limit access to vulnerable areas. Policy describes procedures/frequency and responsibility.
9.	Are the grounds and facility monitored for suspicious activity and unauthorized entry?	
10.	Are “No Trespassing” signs visible along the perimeter of the facility, or are other measures being taken to secure and limit access to vulnerable areas?	
11.	Are assurances concerning food defense practices provided by suppliers of direct or indirect ingredients, product and equipment cleaning and sanitizing compounds, and packaging materials? This may include the use of tamper evident packaging for raw materials, sealing of trailers, and locking of bulk ingredient receiving ports.	<ul style="list-style-type: none"> Review written assurances from suppliers. When possible, verify described assurances through observation.
12.	Is the security of water and utilities within the facility’s control addressed in the Food Defense Plan, and does the plan define limited access by designated company representatives?	<ul style="list-style-type: none"> Review plan for procedures, management responsibilities, and designated personnel. When applicable (company well or water reservoir included), verify limited access through observation.
13.	Does the processing plant have a manufacturer processor registration number (MPN), a Food and Drug Administration (FDA) food facility registration number issued to the manufacturer/processor by FDA?	<ul style="list-style-type: none"> Affidavit or FDA correspondence verifies registration under the FDA Public Health Security and Bioterrorism and Response A of 2002. Verify company documents demonstrate registration of the facility with FDA.

APPENDIX C
Rating Elements Of The Food Defense System Survey

Question	Rating	Objective Evidence
1	Critical	If the facility does not have a formal, documented food defense plan.
1	Critical	If the facility has a formal, documented food defense plan but it is not implemented.
1	Minor	If the facility has a formal, documented food defense plan but it has not been reviewed and verified, annually.
2	Major	If the plan does not include preventive measures relative to product tampering and deliberate contamination at the processing facility and during transport in commerce.
3	Major	If the plan does not include written defense practices listing management contacts and procedures for notifying appropriate authorities in the case of an emergency or security issue.
4	Major	If the plan does not include practices to include screening all potential employees.
5	Major	If after discussing this section with management, you find that they do not have adequate procedures according to their plan (No Identification Method or Restrictions) and/or you get an agreement that they need to improve this area.
6	Major	If the facility states they have not trained their employees in food defense and/ or can not provide any documentation of training their employees in food defense.
6	Major	If employees of the facility have received training in food defense and/or documentation of this training cannot be provided.
7	Major	If you find that supplier delivery personnel, contract workers, and visitors are not restricted access to vulnerable product areas of processing and storage.
8	Major	If the plan states that the outside public has restricted access but you find the facility is not following their procedures which restrict access.
9	Major	After walking around the grounds and processing facility you find them not monitored for suspicious activity or unauthorized entry.
10	Major	If you find that the outside premises is secure, but areas inside the processing facility and/or off-site warehouse facility are not secure, or measures are not being taken to secure and limit access to vulnerable areas.
11	Major	If the plan does not include procedures for assurances concerning food defense practices from suppliers of direct or indirect ingredients, product and equipment cleaning and sanitizing compounds, and packaging materials.
11	Major	If you look at the operations section of the plan and it indicates that all raw materials, incoming vehicles, containers, or rail cars must be sealed, but you observe one that is not sealed.
12	Major	If the water and utilities that are under the control of the facility are not addressed in the plan to have limited access.
13	Critical	If the facility has not registered with FDA to obtain a manufacturer processor registration number.

ACCEPTABLE - No critical or major deficiencies.

UNACCEPTABLE – One or more major or critical deficiencies, practices or operations present that result in critical Food Defense Issues.